

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GANG CHEN,

Plaintiff,

Index No.: 1:20-cv-09232-MKV-SDA

~ *against* ~

**CHINA GREEN AGRICULTURE, INC.,
ZHUOYO LI, YONGCHENG YANG,
DAQING ZHU, YIRU SHI,
KABANI & COMPANY, INC.,
KSP GROUP, INC.,
AMERICAN CORPORATE LEARNING
CENTER,
ABDUL HAMID KABANI,
SHAHNAZ KABANI
and
JASLYN HUYNH AKA JASLYN SELLERS**

Defendants.

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A. **Introduction**

1. I am name **BARUCH GOTTESMAN, ESQ**, counsel for Defendants:
 - (i.) **Abdul Hamid Kabani;**
 - (ii.) **Shahnaz Kabani;¹**
 - (iii.) **Kabani & Co.; and**

¹ The spelling used here – Shahnaz – and in this Memorandum of Law follows the Complaint’s Caption. The Body of the Complaint sometimes refers to Shahnas, *See, e.g.*, Complaint, unnumbered paragraph at p.4, ll.13-16; and ¶ 91 on p. 47.

(iv.) American Corporate Learning Center.²

2. In the Memorandum of Law in Support of the Motion to Dismiss I reference two documents from the record on this case. These are as follows:

Exhibit	Document
Exhibit A	Operative Complaint (originally filed as ECF No. 115)
Exhibit B	Memorandum of Law in Support of Motion to Dismiss earlier version of Complaint (originally filed as ECF No. 95)

3. These Exhibits are true and accurate copies of their originals.

Dated: **FEBRUARY 21, 2022**

RESPECTFULLY SUBMITTED,



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Served Via ECF on All Parties
as a Courtesy, also served by e-mail on the *pro se* Plaintiff

² The name used here – American Corporate Learning **Center** – and in this Memorandum of Law follows the caption and the references throughout the Complaint to the acronym ACLC. It should be noted that the operative complaint sometimes refers to American Corporate Learning **Academy**. See, e.g., Complaint, unnumbered paragraph at p. 46, ll.2-3; ¶¶ 91 and 92 on p. 47.